

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

*filed in
open court
12/3/04*

UNITED STATES OF AMERICA

v.

MOHAMMED ABDUL RASHEED QUARAISHI

)
)
) No. 04-10345-NMG
)
)
)

MOTION TO POST PROPERTY IN SUPPORT OF RELEASE

NOW COMES Defendant Mohammed Abdul Rasheed Quaraishi and hereby moves this Honorable Court to have the property located at 1681 Bloomingdale Road, Glendale Heights, Illinois 60139 (hereinafter the "property") posted in satisfaction of his release.

IN SUPPORT WHEREOF, defendant states as follows:

1. Defendant will sign an **Appearance Bond** and an **Agreement to Forfeit Property** at the Detention Hearing.
2. A **Certification of Title**, attached as Exhibit A, shows that the title to the property has a value of \$129,896.65 that is free and clear of any encumbrances. Included in Exhibit A is a copy of the **Deed** to the property located at 1681 Bloomingdale Road, Glendale Heights, Illinois 60139 showing that Mohammed Abdul Rasheed Quaraishi is the sole of owner.
3. An **Appraisal** of the property is hereby submitted by way of a statement from a real estate broker, dated October 27, 2004, showing the property to be worth \$558,016.00 and a mortgage statement, dated October 4, 2004, showing that Defendant owes a mortgage of \$394, 619.35. These documents are attached as Exhibit B.

4. A **Mortgage** in the amount of \$163,396.65, and in the name of "Clerk, U.S. District Court" as the mortgagee, is attached as Exhibit C.
5. An **Escrow Agreement** holding a quitclaim deed to the property is attached as Exhibit D.
6. A **Quitclaim Deed** conveying title to the property to the "United States of America" is attached as Exhibit E.
7. Defendant further states that he will **Record the Mortgage** immediately following the Detention Hearing (thereafter providing proof of such to the Court), and that he will also add the "Clerk, U.S. District Court" as a joint loss payee on the **Maintenance of Insurance** for the property.

WHEREFORE, Defendant respectfully requests that this Honorable Court release him from custody based, in part, on the posting of the property described herein.

Respectfully submitted,
MOHAMMED ABDUL RASHEED
QUARAISHI
By his attorneys,



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